



STATE OF LOUISIANA  
DEPARTMENT OF STATE CIVIL SERVICE  
**LOUISIANA BOARD OF ETHICS**  
P. O. BOX 4368  
BATON ROUGE, LA 70821  
(225) 219-5600  
FAX: (225) 381-7271  
1-800-842-6630  
www.ethics.la.gov

September 8, 2020

**VIA SHAREPOINT**

The Division of Administrative Law  
1020 Florida Street  
Baton Rouge, LA 70802

RE: *In the Matter of Linda Musson*  
Agency Tracking No.: 2019-580

Dear Ms. Duhon:

Please file the attached *Charges*.  
If you have any questions, please do not hesitate to contact me at 225-219-5619, and  
thank you.

Kindest regards,

LOUISIANA BOARD OF ETHICS

Elizabeth Barrouquere  
Staff Paralegal

Enclosures

cc: Ms. Linda Musson  
160 Meandering Way  
Houma, Louisiana 70360-6092  
(via certified mail no. 70191120000179863021)

AN EQUAL OPPORTUNITY EMPLOYER

STATE OF LOUISIANA  
DIVISION OF ADMINISTRATIVE LAW

LOUISIANA BOARD OF ETHICS	*	
	*	
	*	DOCKET NO.
	*	
IN THE MATTER OF	*	
	*	
LINDA MUSSON	*	AGENCY TRACKING NO. 2019-580

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CHARGES

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The Louisiana Board of Ethics (hereinafter referred to as the “BOE”) voted on September 2, 2020 to and does hereby file the following Charges:

1.

The BOE is an agency of the State of Louisiana domiciled in East Baton Rouge Parish, Louisiana.

2.

The BOE is authorized to file these Charges by virtue of the provisions of La. R.S. 42:1141C(3)(a) and (b); the Ethics Adjudicatory Board has jurisdiction of this matter pursuant to La. R.S. 42:1141C(3)(a) and La. R.S. 42:1141.5; and East Baton Parish, the domicile of the BOE and Ethics Adjudicatory Board, is the proper venue pursuant to La. R.S. 42:1141.3.

3.

Made Respondent herein is

**Linda Musson**, a person of the full age of majority, domiciled in the Parish of Terrebonne with a last known address of 160 Meandering Way, Houma, Louisiana 70360-6092.

4.

The Maxine Giardina Charter School, Inc., registered with the Louisiana Secretary of State on June 27, 2006 as a nonprofit corporation. The Maxine Giardina Charter School, Inc., operates the Maxine Giardina Charter School.

5.

On June 6, 2007, the Board of Elementary and Secondary Education approved the Maxine Giardina Charter School, Inc.'s application for a Type 2 charter school and entered into a Charter School Contract with the Maxine Giardina Charter School, Inc. for a term of three (3) years. The Charter School Contract was renewed on July 1, 2012 and again on July 1, 2018.

6.

On September 12, 1997, the Giardina Family Foundation was created as a trust for the purpose of providing benefits for charitable, religious, scientific, medical, literary or educational purposes. Jacob A. Giardina and Maxine Gros Giardina were the initial Board of Trustees of the trust.

7.

Giardina Family Foundation provides teacher training and public awareness on dyslexia. Since the opening of the Maxine Giardina Charter School, the Giardina Family Foundation has focused on funding a variety of projects at the school while still providing awareness opportunities for parents and teachers as well as some support of the Louisiana Center for Dyslexia at Nicholls State University.

8.

Linda Musson is the sole owner of Teach to Teach, LLC, which was formed and registered with the Louisiana Secretary of State on January 30, 2002.

9.

Linda Musson worked at the Maxine Giardina Charter School from its creation in 2007 until her voluntary resignation on June 30, 2018 as follows:

- In 2007, Teach to Teach, LLC was hired as a Curriculum Consultant where Linda Musson trained and monitor teachers, and evaluated the effectiveness of the language arts curriculum.
- On June 30, 2011, Linda Musson, through her company Teach to Teach, LLC, was appointed as the Director/Principal of the Maxine Giardina Charter School for the 2011 - 2012 school year.
- On July 1, 2012, Linda Musson, through her company Teach to Teach, LLC, was reappointed as the Director/Principal of the Maxine Giardina Charter School for the 2012-2013 school year
- For the 2013 - 2014 school year, Linda Musson, through her company Teach to Teach, LLC, was reappointed as the Director/Principal of the Maxine Giardina Charter School.
- For the 2014 - 2015 school year, Linda Musson, through her company Teach to Teach, LLC, was reappointed as the Director/Principal of the Maxine Giardina Charter School.
- For the 2015 - 2016 school year, Linda Musson, through her company Teach to Teach, LLC, was reappointed as the Director/Principal of the Maxine Giardina Charter School.
- For the 2016-2017 school year, Linda Musson, through her company Teach to Teach, LLC, was reappointed as the Director of the Maxine Giardina Charter School.
- For the 2017 - 2018 school year, Linda Musson, through her company Teach to Teach, LLC, was reappointed as the Director of the Maxine Giardina Charter School.



10.

Linda Musson received a W-2 Wage and Tax Statements evidencing her receipt of income from employment from the Maxine Giardina Charter School in the amount of \$19,249.98 in 2017 and \$23,613.28 in 2018.

11.

As the Director/Principal of the Maxine Giardina Charter School between July 1, 2011 through June 30, 2016, Linda Musson duties and responsibilities included the following:

- Serving as the educational leader and chief executive of the school.
- Supervise the faculty and staff and be responsible for the recruiting, screening, hiring, training, assigning, and the evaluating of the staff.
- Manage school administrative functions, evaluate, and supervise effective and clear procedures for the operation and functioning of the school.
- Supervise the instructional programs of the school, evaluating lesson plans and observing classes on a regular basis.
- Communicate with the board regularly about the needs, successes, and general operation of the school.
- Keep the staff informed and seek ideas for the improvement of the school.
- Represent the school within the community forums for the purpose of maintaining ongoing community support for education goals and/or assisting with issues related to school environment.

12.

As the Director of the Maxine Giardina Charter School between July 1, 2016 through June 30, 2018, Linda Musson duties and responsibilities included the following:

- Participate with the Board of Directors in developing a vision and strategic plan to guide the Maxine Giardina Charter School.

- Identify, assess, and inform the Board of Directors of internal and external issues that affect the Maxine Giardina Charter School.
- Act as a professional advisor to the Board of Directors on all aspects of the Maxine Giardina Charter School.
- Ensure that the operation of the Maxine Giardina Charter School meets the expectation of its clients, Board, and Founders.
- Oversee the efficient and effective day to day operation of the Maxine Giardina Charter School.
- Monitor the day-to-day delivery of the programs and services to maintain or improve quality.
- Work with the Board of Directors to secure adequate funding for the operation of the Maxine Giardina Charter School.
- Research funding sources, oversee the development of fundraising plans and write funding proposals to increase the funds of the Maxine Giardina Charter School.
- Participate in fundraising activities as appropriate.

13.

As the Director/Principal and then just the Director of the Maxine Giardina Charter School, Linda Musson was the Chief Administrative Officer and an Agency Head as defined by La. R.S. 42:1102(3).

14.

On August 1, 2018, following her resignation from the Maxine Giardina Charter School on June 30, 2018, Linda Musson accepted employment with the Giardina Family Foundation as a consultant.

15.

As an employee of the Giardina Family Foundation, Linda Musson's job duties and responsibilities included:

- Engage in public relations activities with surrounding parishes
- Perform grant writing to secure funds for needed materials
- Become liaison between Maxine Giardina Charter School and Nicholls University
- Chronicle the successes of Maxine Giardina Charter School Alumni
- Advertise the school through billboards, rack cards, pamphlets, etc.
- Assist in updating the Maxine Giardina Charter School's website
- Produce and direct the Maxine Giardina Charter School's annual Christmas play
- Attend meetings of local chapters of the Chamber of Commerce
- Attend education seminars and meetings called by the State Department of Education
- Keep the board informed on issues, changes, and recommendations for academic improvement

16.

The Giardina Family Foundation issued W-2 Wage and Tax Statements to Linda Musson evidencing her receipt of income in the amount of \$12,833.22 in 2018 and \$38,499.96 in 2019.

17.

The following provisions of the Louisiana Code of Governmental Ethics are implicated by the alleged facts stated herein:

- (1) **La. R.S. 42:1102(3)** defines "Agency head" to mean the chief executive or administrative officer of an agency or any member of a board or commission who exercises supervision over the agency.



- (2) **La. R.S. 42:1102(23)** defines "Transaction involving the governmental entity" to mean any proceeding, application, submission, request for a ruling or other determination, contract, claim, case, or other such particular matter which the public servant or former public servant of the governmental entity in question knows or should know: (a) Is, or will be, the subject of action by the governmental entity. (b) Is one to which the governmental entity is or will be a party. © Is one in which the governmental entity has a direct interest.
- (3) **La. R.S. 42:1121A(1)** provides no former agency head or elected official shall, for a period of two years following the termination of his public service as the head of such agency or as an elected public official serving in such agency, assist another person, for compensation, in a transaction, or in an appearance in connection with a transaction, involving that former agency or render any service on a contractual basis to or for such agency.
- (4) **La. R.S. 42:1121B** provides no former public employee shall, for a period of two years following the termination of his public employment, assist another person, for compensation, in a transaction, or in an appearance in connection with a transaction in which such former public employee participated at any time during his public employment and involving the governmental entity by which he was formerly employed, or for a period of two years following the termination of his public employment, render, any service which such former public employee had rendered to the agency during the term of his public employment on a contractual basis, regardless of the parties to the contract, to, for, or on behalf of the agency with which he was formerly employed.
- (5) **La. R.S. 42:1153B** provides that upon finding that any public employee or other person has violated any provision of any law within the jurisdiction of the board . . ., the board by a majority vote of the membership, may remove, suspend, or order a reduction in pay, or demotion of the public employee or other person, or impose a fine of not more than ten thousand dollars, or both.
- (6) **La. R.S. 42:1155A** provides that if an investigation pursuant to R.S. 42:1141 reveals that any public servant or other person has violated any law within the jurisdiction of the board to his economic advantage, the board may order the payment of penalties. Recovery may include, in addition to an amount equal to such economic advantage, penalties not to exceed one half of the amount of the economic advantage.

18.

Based on the foregoing facts stated herein, Linda Musson, in her capacity as the former Principal/Director of the Maxine Giardina Charter School, violated La. R.S. 42:1121 **each time** she



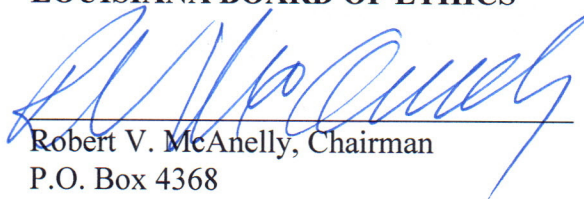
assisted the Giardina Family Foundation, for compensation, with the Maxine Giardina Charter School when she performed the duties as liaison between Maxine Giardina Charter School and Nicholls University; chronicled the success of Maxine Giardina Charter School alumni; provided advertising for the Maxine Giardina Charter School; produced and directed the Maxine Giardina Charter School Christmas Play; and, advised the Maxine Giardina Charter School Board on issues, changes, and recommendations for academic improvement, within two years of the termination of her service as the Principal/Director of the Maxine Giardina Charter School.

19.

In accordance with La. R.S. 42:1141(C)(3)(b)(iv), on September 3, 2020, the BOE designated Tracy M. Barker and Suzanne Q. Mooney as the BOE's trial attorneys in this matter.

**WHEREFORE**, the Louisiana Board of Ethics respectfully prays that the Ethics Adjudicatory Board (a) conduct a hearing on the foregoing charges; (b) determine that Linda Musson violated La. R.S. 42:1121, with respect to the foregoing stated facts; and (c) assess appropriate penalties in accordance with the Louisiana Code of Governmental Ethics.

**LOUISIANA BOARD OF ETHICS**



Robert V. McAnelly, Chairman

P.O. Box 4368

Baton Rouge, LA 70821

Telephone: (225) 219-5600

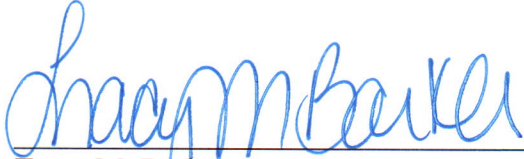
Facsimile: (225) 381-7271

**[CERTIFICATE OF SERVICE ON FOLLOWING PAGE]**

**CERTIFICATE OF SERVICE**

I hereby certify that a copy of these Charges have been issued for service to the Respondent,  
Linda Musson, at her last known address, by certified mail in accordance with La. R.S. 42:1141.4,  
on this 8th day of September, 2020.

**LINDA MUSSON**  
160 Meandering Way  
Houma, Louisiana 70360-6092

A handwritten signature in blue ink, reading "Tracy M. Barker", is written over a horizontal line.

Tracy M. Barker  
Trial Attorney